

US EPA ARCHIVE DOCUMENT



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

DIVISION OF AIR POLLUTION CONTROL  
9<sup>TH</sup> FLOOR L & C ANNEX, 401 CHURCH STREET  
NASHVILLE, TENNESSEE 37243-1531

December 21, 2007

J.I. Palmer, Jr  
Regional Administrator  
US EPA, Region IV  
Atlanta Federal Center, 12<sup>th</sup> Floor  
61 Forsyth Street, SW  
Atlanta, GA 30303

Dear Mr. Palmer:

I am enclosing for EPA's review and approval five (5) copies of the December 2007 Attainment and Milestone Report for Tennessee's Early Action Compact (EAC) Areas in Hamilton County, Middle Tennessee, and Tri-Cities. Electronic copies were submitted December 21, 2007. The state is required to submit two letters to satisfy EAC protocol. The first letter certifying the 2007 8-hour ozone ambient air monitoring data for each EAC area has been quality assured and entered into the Air Quality System. A copy of this letter submitted to EPA dated December 5, 2007 is enclosed with this submittal.

To satisfy the second EAC protocol requirement, enclosed you will find the EAC milestone reports for each EAC area and all applicable control measures have been implemented and maintained through December 2007. The state has certified that the 2005 through 2007 ozone data has been quality assured, shows attainment, and all of the EAC areas have been successful in attaining the 8-hour ozone NAAQS standard prior to December 31, 2007.

With this final EAC submittal, it is believed that the state has provided the necessary documentation showing that all EAC areas in the State of Tennessee have achieved attainment of the 8-hour ozone standard. If any additional information is needed or if you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, reading "Barry R. Stephens", is written over a printed name.

Barry R. Stephens, P.E., Director  
Division of Air Pollution Control  
Department of Environment & Conservation

Enclosures

Copy to:

Kay Prince, Dick Schutt, Jane Spann EPA Region IV  
TN Air Pollution Control Board Members  
Local Air Pollution Control Program Directors



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF AIR POLLUTION CONTROL  
9TH FLOOR, L & C ANNEX  
401 CHURCH STREET  
NASHVILLE, TN 37243-1531

June 27, 2007

Certified Mail #: 7007 0220 0000 1425 2772  
*Return Receipt Requested*

David Lutz  
Data Certification Contact  
US EPA (D304-06)  
Ambient Air Monitoring Group  
Research Triangle Park, NC 27711

Dear Mr. Lutz:

The State of Tennessee and its four local air pollution control programs have completed entry of their 2006 ambient air quality data into the Air Quality Subsystem (AQS).

The purpose of this letter is to certify to the EPA that the ambient concentration data and the quality assurance data are completely submitted to AQS and that the ambient data are accurate to the best of our knowledge taking into consideration the quality assurance findings. An electronic copy of this letter and the referenced attachments will follow by email.

Should you have any questions regarding this data, please feel free to call Mr. Billy Pugh or myself at (615) 532-0554.

Sincerely,

Jackie L. Waynick, Manager  
Technical Services Program

JLW:rb:gc

Cc: Letters only to the following:  
Darren Palmer, EPA Region IV  
Virginia Ambrose, EPA RTP  
Danny France, EPA Region IV  
Bob Colby, Chattanooga APC  
Rob Raney, Nashville APC  
Lynne Liddington, Knoxville APC  
Bob Rodgers, Memphis APC  
Ron Culberson, Central Office APC  
Billy Pugh, Central Office APC



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
Division of Air Pollution Control  
9<sup>th</sup> Floor, L & C Annex, 401 Church Street  
Nashville, Tennessee 37243-1531  
Telephone: (615) 532-0554

June 23, 2006

Certified Mail # 7002 2410 0005 2409 1397  
Return Receipt Requested

Mr. David Lutz  
109 TW Alexander Drive  
MD C304-06  
U.S. EPA  
Research Triangle Park, NC 27711

Dear Mr. Lutz:

The State of Tennessee and its four local air pollution control agencies have completed entry of their 2005 ambient air quality data into the Air Quality Subsystem (AQS).

The purpose of this letter is to certify to the EPA that this data is true and accurate to the best of our knowledge and meets minimum reporting requirements. The AMP 240 and AMP 450 reports are attached. Electronic copies will follow.

Should you have any questions regarding this data, please feel free to call Mr. Billy Pugh or myself at (615) 532-0554.

Sincerely,

A handwritten signature in cursive script that reads "Jackie L. Waynick".

Jackie L. Waynick, Manager  
Technical Services Program

JLW:lb

*Attachments 2*

Cc: Letters only to the following:  
Darren Palmer, EPA Region IV  
Virginia Ambrose, EPA RTP  
Danny France, EPA Region IV  
Bob Colby, Chattanooga APC  
Rob Raney, Nashville APC  
Lynne Liddington Knoxville APC  
Bob Rogers, Memphis APC  
Ron Culberson, Central Office APC  
~~and Billy Pugh, Central Office APC~~



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

**DIVISION OF AIR POLLUTION CONTROL  
9TH FLOOR, L & C ANNEX  
401 CHURCH STREET  
NASHVILLE, TN 37243-1531**

December 5, 2007

CERTIFIED MAIL: 7007 0220 0000 1425 2802  
RETURN RECEIPT REQUESTED

Mr. David Lutz  
U.S. Environmental Protection Agency  
109 TW Alexander Drive  
MD C304-06  
RTP, NC 27711

Dear Mr. Lutz:

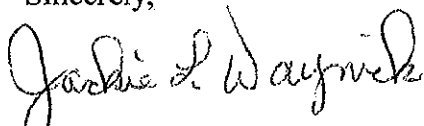
This letter is to advise you the State of Tennessee has completed entry of a portion of its ambient ozone data for the 2007 monitoring season into AQS. Ozone data for reporting organizations 1025, 0581, 0682, 0673, and 0170 have been evaluated according to EPA criteria and is complete and accurate to the best of this agency's knowledge. Copies of the AMP 255 Excel Summary Reports and AMP 450 Report are enclosed with this letter and have been forwarded to you electronically. Please proceed with placing the proper certification flag on this data in AQS.

We have flagged a number of days we believe ozone was affected by exceptional events in 2007. Our initial request to confirm the exceptional events was sent to Region 4's Doug Neeley on August 3, 2007. A final package is being prepared at this time for submittal.

David Lutz  
December 5, 2007  
Page 2

If you have any questions regarding this matter or need additional information, please contact Mr. Billy Pugh at (615) 532-0528. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Jackie L. Waynick". The signature is written in dark ink and is positioned above the printed name and title.

Jackie L. Waynick, Manager  
Technical Services Program

JLW/jct

Enclosure

cc: Darren Palmer, EPA Region 4  
Danny France, EPA Region 4  
Lynne Liddington, Knoxville APC  
Bob Rogers, Memphis APC  
Robert H. Colby, Chattanooga APC  
Rob Raney, Nashville APC

## **TENNESSEE'S EARLY ACTION COMPACT AREAS SUMMARY**

This document represents Tennessee's final Early Action Compact (EAC) submittal in accordance with the EAC protocol. The regulatory State Implementation Plan (SIP) was required for the December 31, 2004 EAC milestone, and demonstrated the early attainment of the 8-hour ozone standard. Consistent with the tenets of the Early Action Compacts on file with the United States Environmental Protection Agency, the Tennessee State Implementation Plan has been amended by the Air Pollution Control Board to incorporate the air quality analysis technical documentation and quantification of control measures being implemented in the Early Action Compact areas in Middle Tennessee, Chattanooga and the Tri-Cities area of the state. The SIP was submitted to EPA December 29, 2004.

This SIP submittal included the addendum to the modeling that was provided in the November 2nd public hearing package and demonstrated that all three EAC areas in Tennessee would attain the 8-hour ozone standard by December 31, 2007. With this final EAC submittal, the state has certified that the 2005 through 2007 ozone data has been quality assured, shows attainment, and all of the EAC areas have been successful in attaining the 8-hour ozone NAAQS standard prior to December 31, 2007.

The Local Portion for each EAC area shows that control measures have been maintained through December 2007. Each EAC area has provided a detailed Final Progress Report showing their commitment to clean air and achieving the 8-hour ozone standard.

Enforceable state control measures implemented in Chapter 1200-3-29 Light-Duty Motor Vehicle Inspection and Maintenance, Chapter 1200-3-36 Motor Vehicle Tampering, and Chapter 1200-3-18-.22 and .24 for Stage I Gasoline Vapor Recovery were provided in the December 2004 SIP submittal.

### **CERTIFICATION OF OZONE DATA 2005 - 2007**

The August 21, 2007 letters sent to each EAC area in Tennessee (Chattanooga, Nashville and Tri-Cities) included instructions from EPA on the final written documentation required to be submitted by each EAC area in order to achieve the next required milestone for the EAC areas. Each EAC area was asked to supply a letter "certifying that the 2007 8-hour ozone ambient air monitoring data for each EAC area has been quality assured and entered into the Air Quality System (AQS) by December 31, 2007." Additionally EPA has requested "a second letter" "that the State has certified that the 2005 through 2007 ozone season monitoring data for each EAC area has been quality assured and shows attainment with the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). The second letter is also due by December 31, 2007." In order to comply with this request, the following dates are provided that document the certification and completion of the entry of the quality assured

data by Tennessee into AQS for the ozone monitoring sites located in the EAC areas of the state.

<b>Calendar Monitoring Year</b>	<b>Date of Certification Letter to EPA</b>
2005	June 23, 2006
2006	June 27, 2007
2007	December 5, 2007

The date of submittal of the letter for the 2007 ozone monitoring season reflects compliance with the requested December 31, 2007 due date. The 2005 and 2006 letter submittal dates also reflect compliance with the December 31, 2007 requested due date. Copies of the specified letters are also included for reference in an electronic file: (Tennessee Data Certifications 2005 2006 2007.pdf).

The discussion of progress in implementation of all applicable control measures by each EAC is provided in the December 21, 2007 milestone report. The following table confirms that the EAC areas in Tennessee demonstrate “attainment with the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS)” based on the 2005 through 2007 certified and quality assured ozone monitor data.

<b>EAC Areas</b>	<b>County</b>	<b>Site Name</b>	<b>MONITOR ID</b>	<b>2007 4th Max.</b>	<b>Final 2005 2007 DV</b>
<b>Chattanooga EAC Area</b>	Hamilton Co	6200 Bonny Oaks Drive, Eastside Filter Plant	470654003 - 1	0.089	0.084
	Hamilton Co	Soddy Daisy H.S., 620 Sequoyah RD.	470651011 - 1	0.085	0.083
	Meigs Co	8401 Highway 60	471210104 - 1	0.083	0.081
<b>Nashville EAC Area</b>	Davidson Co	1015 Trinity Lane	470370011 - 1	0.076	0.072
	Davidson Co	Percy Priest	470370026 - 1	0.08	0.079
	Rutherford Co	Eagleville Puckett'S Farm	471490101 - 1	0.089	0.08
	Sumner Co	Rockland Recreation Area-Old Hickory Dam	471650007 - 1	0.083	0.084
	Sumner Co	Cottontown Wright's Farm	471650101 - 1	0.085	0.082
	Williamson Co	Fairview Middle School Crow Cut Road	471870106 - 1	0.085	0.077
	Wilson Co	Cedars Of Lebanon State Park	471890103 - 1	0.085	0.082
<b>Tri-Cities EAC Area</b>	Sullivan Co	Hill Road	471632002 - 1	0.09	0.083
	Sullivan Co	Ketron Middle School On Bloomingdale Rd.	471632003 - 1	0.085	0.083

Data as of 12/10/2007 (2007)

With this final EAC submittal, it is the state's belief that the necessary documentation showing that all EAC areas in the State of Tennessee have successfully achieved attainment of the 8-hour ozone standard as shown by monitoring data for 2005 through 2007.



**MIDDLE TENNESSEE EARLY ACTION COMPACT  
FINAL PROGRESS REPORT  
DECEMBER 31, 2007**

**1.0 Introduction**

This submittal is the December 31, 2007 final report on the implementation of the control strategies for the Middle Tennessee Early Action Compact (EAC) area. The Middle Tennessee EAC area includes the counties of Davidson, Rutherford, Sumner, Williamson and Wilson. The area has implemented, or is on track toward implementing, all the measures specified in the March 31, 2004 Air Quality Improvement Plan (AQIP). The AQIP is the local air quality plan defining the specific measures to be taken to ensure compliance with the 8-hour ozone National Ambient Air Quality Standard (NAAQS) by December 31, 2007.

The local governments of the Middle Tennessee Early Action Compact (EAC) developed and adopted a list of local control measures intended to reduce area levels of ozone precursors. Modeling for the adopted local control measures done through the multi-state project known as ATMOS (Arkansas, Tennessee and Mississippi Ozone Study) demonstrated that the Middle Tennessee area should be able to attain the 8-hour ozone standard by the 2007 deadline.

The region programmed funding for implementation of these measures primarily through adoption of the projects and programs in the Transportation Improvement Program of the Nashville Area Metropolitan Planning Organization.

For the years 2002 through 2007 all monitors in the Middle Tennessee area demonstrated attainment with the 8-hour ozone NAAQS by each three year average of the annual fourth highest value being less than 0.085 ppm. Appendix A contains the letters from the Metro Public Health Department, Air Pollution Control Division and the Tennessee Department of the Environment, Air Pollution Control Division certifying that the 2007 ozone data has been quality assured, is accurate, complete and should be used for designation purposes. Table 1 shows the annual fourth highest 8-hour ozone values at each of the Middle Tennessee monitors from 2002 – 2007 and the three year design value for each monitor.

Elevated 8-hour ozone values were recorded in the Middle Tennessee area during the summer of 2007. Historically, the monitor showing the highest ozone values in Middle Tennessee has been the monitor located at Rockland Road in Sumner County and designated as 4716500007-1. The fourth highest 8-hour ozone value measured at the Rockland Road site during the summer of 2007 was 0.083 ppm, and the 2004 – 2007 average of the annual fourth highest value was 0.084 ppm. Based on 2004 through 2007 quality assured data, all monitors in Middle Tennessee demonstrated attainment with the 8-hour ozone NAAQS.

**TABLE 1**  
**ANNUAL FOURTH MAXIMUM AND THREE YEAR DESIGN VALUES**  
**FOR THE MIDDLE TENNESSEE OZONE MONITORS**

Year	East Health Center 470370011	Percy Priest Dam 470370026	Eagleville 471490101	Rockland Road 471650007	Cottontown 471650101	Fairview Middle School 471870106	Cedars of Lebanon 471890103
2002	0.073	0.079	0.090	0.086	0.087	0.094	0.088
2003	0.064	0.074	0.076	0.086	0.074	0.080	0.079
2004	0.064	0.076	0.070	0.078	0.076	0.072	0.071
2005	0.070	0.079	0.079	0.083	0.078	0.076	0.081
2006	0.072	0.079	0.074	0.088	0.083	0.072	0.080
2007	0.076	0.080	0.089	0.083	0.085	0.085	0.085
2002 - 2004	0.067	0.076	0.078	0.083	0.079	0.082	0.079
2003 - 2005	0.066	0.076	0.075	0.082	0.076	0.076	0.077
2004- 2006	0.068	0.078	0.074	0.083	0.079	0.073	0.077
<b>2005- 2007</b>	<b>0.072</b>	<b>0.079</b>	<b>0.080</b>	<b>0.084</b>	<b>0.082</b>	<b>0.077</b>	<b>0.082</b>

Table 2 shows the critical values which would have yielded a violation of the ozone NAAQS for 2005 – 2007 for each ozone monitoring site in Middle Tennessee. Based on 2005 and 2006 data, the Rockland Road site would have needed a 2007 fourth highest 8-hour ozone value of 0.084 ppm or greater in order for a violation of the 8-hour ozone NAAQS to occur. This was clearly a concern, but it was our belief that the combination of Local, State and Federal control measures that are in place would yield the desired outcome of the Middle Tennessee area attaining the 8-hour ozone NAAQS by December 31, 2007.

**TABLE 2**  
**8-HOUR OZONE ANNUAL 4<sup>TH</sup> MAXIMUM SUMMARY**

County	Site Name	2002 4 <sup>th</sup> Max.	2003 4 <sup>th</sup> Max.	2004 4 <sup>th</sup> Max.	2005 4 <sup>th</sup> Max.	2006 4 <sup>th</sup> Max.	2007 4 <sup>th</sup> Max. Needed for 8-Hr. Ozone Violation	2007 Actual 4 <sup>th</sup> Max.
Davidson	East Health Center	0.073	0.064	0.094	0.070	0.072	0.113	0.076
Davidson	Percy Priest Dam	0.079	0.074	0.076	0.079	0.079	0.097	0.080
Rutherford	Eagleville	0.090	0.076	0.070	0.079	0.074	0.102	0.089
Sumner	Rockland Road	0.086	0.086	0.078	0.083	0.088	0.084	0.083
Sumner	Cottontown	0.087	0.074	0.076	0.078	0.083	0.094	0.085
Williamson	Fairview Middle Sch.	0.094	0.080	0.072	0.076	0.072	0.107	0.085
Wilson	Cedars of Lebanon	0.088	0.079	0.071	0.081	0.080	0.094	0.085

Table 2 shows that the Middle Tennessee area attained the 8-hour ozone NAAQS since the 2007 actual 4<sup>th</sup> maximum 8-hour ozone value at all monitoring sites was less than the value that would have caused a violation. There have been no monitored 8-hour ozone values in Middle Tennessee that would cause a violation of the NAAQS since the 2001 – 2003 averaging period.

## 2.0 Emission Reduction Measures

The planned schedule for implementation of the various control measures is included in the December 31, 2004 SIP submittal. Some of the implementation schedules have been adjusted to account for delays that invariably occur with planning assumptions. Many projects have been completed, or are nearing completion, that will have a positive impact on air quality in the Middle Tennessee area. The following table lists the general status of each control measure followed by a more complete summary.

Emission Reduction Measure	Scheduled Implementation Date	Status of Emission Reduction Measure
Expand existing IM program to include gas and diesel vehicles up to 10,500# GVWR <sup>1</sup>	April 1, 2005	Implemented on April 1, 2005
Construction land clearing (open burning)	March 1, 2004	Implemented on March 1, 2004
HOV lane expansion	2004 - 2008	Mostly complete – Last I-24 project to be completed 6/1/08
Trip reduction plans	2004 – 2007 and on-going	Mostly complete – Additional work in progress
Rideshare programs	2004 – 2007 and on-going	Mostly complete – Additional work in progress
Traffic signal synchronization	2004 – 2007 and on-going	Original project complete – Additional work ongoing
Roadside assistance program	2004	Project implemented
New greenways/bikeways	2004 – 2007 and on-going	Several projects complete with several more planned or under construction – Construction will continue for several years
Improve bus ridership	2004 – 2007 and on-going	Mostly complete – Additional work in progress
New rail service	September, 2006	Project implemented - Nashville to Lebanon corridor began daily service in September, 2006
Land use controls to reduce VMT	2004 – 2007 and on-going	Significant work completed – Significant work is remaining
Air Quality Action Day (AQAD) Measures	May 1, 2004	Project implemented

<sup>1</sup> This is the only federally enforceable measure included in the March 31, 2004 AQIP. Also, the emission reductions from this program were the only ones used in the modeled attainment demonstration for the Middle Tennessee EAC area.

Following is a brief summary of the implementation status of the one federally enforceable measure and each of the voluntary measures outlined in the March 31, 2004 AQIP.

## **2.1 Expand Existing Vehicle Inspection Program to Include Gas and Diesel Vehicles Up To 10,500# GVWR**

The Middle Tennessee counties of Davidson, Rutherford, Sumner, Williamson and Wilson have an existing Vehicle Inspection Program. Previously, these programs tested only light duty gasoline vehicles up to 8,500# GVWR. Existing regulations were amended to include all gasoline and diesel vehicles up to 10,500# GVWR. This program was implemented on schedule as planned on April 1, 2005.

The contract with Envirotec (contractor that previously operated the testing sites in Davidson County) expired on June 30, 2007 for the Davidson County program only. Systech International began operation of the Davidson County vehicle inspection program on July 1, 2007. A seamless transition occurred with no disruption to the existing program. Envirotec will continue operating the program in the four surrounding counties that currently have a vehicle inspection program until at least 2011.

## **2.2 Construction Land Clearing - Open Burning (Davidson County only)**

This emission reduction measure is only applicable in Davidson County. Open burning of land clearing material in Davidson County is allowed only with the proper use of an air curtain destructor and a permit from the Metro Nashville Air Pollution Control Division (MNAPCD). On March 1, 2004, the MNAPCD began adding a condition to each air curtain destructor permit. This condition prohibits the open burning of land clearing material on any day the air quality is forecast to be worse than the moderate (yellow) category as determined by the EPA air quality index. This measure is currently being implemented with no problems.

## **2.3 HOV Lane Expansion**

TDOT has completed construction of the new HOV lanes added to Interstate 40 East in Davidson County from Interstate 24 to Donelson Pike. The HOV lane work was completed several months ahead of schedule.

TDOT has completed work on the HOV lanes on Interstate 24 in Rutherford County from State Highway 96 to State Route 840.

Construction is underway on the HOV lane addition to Interstate 24 in Rutherford County from U.S. 231 to State Highway 96. The project is scheduled for completion on June 1, 2008. Construction is progressing on schedule.

## **2.4 Funding and new infrastructure for rideshare/trip reduction programs**

There has been no action on the Smyrna (Rutherford County) Intermodal Transportation Center project. With the alternative analysis study supporting bus service and not rail, the location study may need to be looked at again. A completion date would be long-term, in conjunction with expanded transit service in the southeast corridor.

The Regional Transportation Authority (RTA) has implemented a ridesharing program that promotes single occupant vehicle (SOV) alternatives such as computer ride matching,

guaranteed ride home, broker vans and riders for vanpools, carpools and buses. Funding has been extended for this program through FY2008. The RTA is making enhancements to its vanpooling program with the installation of new, web-based ridematching software. Staff has received software training and the program is in operation.

RTA has also purchased two new “over-the-road coaches” to offer better service for riders on its long-distance express bus routes between Nashville and Murfreesboro. In addition, the RTA has purchased new vans including new conventional fueled vans to replace older vans, new hybrid vans, and lift equipped vans. These new, cleaner operating vans have been placed into service.

The TMA Group in Williamson County is continuing its existing rideshare program by conducting outreach to employers and employees through transportation fairs, transit fairs, newsletters, advertisement and a “Clear the Air” educational cable television program.

In 2006, The TMA Group and the RTA entered into partnership. The TMA Group manages and operates the regional vanpool program, consisting of 40 vans serving nine Middle Tennessee Counties. The program currently services over 300 daily riders. The RTA estimates that their regional vanpool program eliminates more than 15,000,000 miles per month on roads by participants, and saves over \$1,260,000 annually due to the reduction in highway maintenance through this program. The RTA manages the ride-matching for the regional vanpool program.

## **2.5 Traffic Signal Synchronization and Related Improvements**

Phases 1 and 2 of the Davidson County signal synchronization project have been completed. The overall project includes creating multiple closed loop systems, installing loop detectors at non-actuated intersections and installing peripheral equipment needed for monitoring. This work is designed to improve traffic flow and pedestrian access.

Davidson County has completed the controller portion of Phase 3 of its signal system update. Phase 3B (fiber optic signal communication) is part of a larger ITS project, and the kickoff meeting was held on November 13, 2007. All design work should be completed by June 2008, and construction will begin soon thereafter

Phase IA of the Advanced Traveler Information System in Davidson County is moving forward on schedule. The consultant has been selected, and work is scheduled for completion in June, 2008. When completed, this system will include signalized intersection improvements, the replacement of signal displays with LED signal heads, added pedestrian signals and the replacement of loop detectors with video or other detection.

Davidson County is also in the process of retiming traffic signals across the county. Most of the 547 signals have been retimed with the remaining to be completed in 2008. It has been estimated that Phase 1 resulted in a 6 percent reduction in fuel consumption on the seven corridors, and Phase 2 resulted in an 11 percent reduction in fuel consumption on fourteen corridors. Although, emission reductions were not calculated, a corresponding reduction would be expected.

Design of Phase 1 of the Metro ITS system is near completion. Construction is expected to begin in late 2007 or early 2008. The project will install advanced communications and expand the central signal system software control to four major corridors. It will also provide CCTV coverage of these corridors. A Traffic Management Center will be constructed to actively monitor and manage traffic flow on these corridors and in the downtown area. A second phase of this project has been funded for expansion to other corridors in Davidson County. The consultant has been selected and project design is underway.

Work has begun on the design of an advanced Wayfinding system. Preliminary implementation will be concentrated in the downtown area. However, the design of this system may be applied elsewhere within the county. Meetings have begun with the stakeholders. Final design and implementation are expected to occur in 2008.

The City of Hendersonville (Sumner County) is currently replacing some of its older signals. This is in preparation for implementing a citywide closed loop system and signal upgrade including closed circuit TV (CCTV) monitors and a monitoring facility. This closed loop system has been placed on hold.

Planning is continuing on The City of Murfreesboro (Rutherford County) closed circuit TV (CCTV) and traffic signal interconnect project. This project includes the installation of fiber optic cable, interconnected signalized intersections along three state routes and the installation of CCTV cameras. This project originally had a scheduled completion date during the fall of 2008. However, the project has been delayed, and the estimated completion date is now February, 2009. Signalization of the intersection of Stones River Road at the Old Nashville Highway is under design. They are currently preparing the right-of-way purchase. The estimated completion date is the fall of 2008.

Several projects are in progress in Williamson County. The City of Franklin Traffic Operations Center (Phase 3), including system software, dynamic message signs and cameras, is currently in progress. A software update contract (12 month project) was issued by the City of Franklin in November, 2007.

The City of Brentwood Closed Loop Signal System (Phase 1), which includes interconnecting all intersection master loops and monitoring equipment to a centralized system, has been completed. The North Brentwood Signal Interconnect project has been combined with the City of Brentwood's Closed Loop Signal System. The entire project has been completed. The Cool Springs Closed Loop Signal System, which created a closed loop signal system throughout the Cool Springs area, has been completed and is operational.

## **2.6 Roadside Assistance Program**

This is an on-going program, involving roving TDOT Help Trucks, that has been implemented on the interstate system in Davidson County. This program began in July of 1999 and has proven to be an asset in minimizing traffic build-up due to wrecks or disabled vehicles. Based on the latest reported information from the TDOT Incident Management Office Annual Report, July 1, 2005 to June 30, 2006, the total number of vehicles assisted was 28,587 and the total number of vehicles relocated outside of the travel lane was 3,153. These



actions by the TDOT Help Truck staff have made a noticeable improvement in traffic flow on the Davidson County interstate system.

In addition to the TDOT Help Trucks, the Metro Nashville Department of Public Works has added a Roadside Emergency Assistance Program to aid motorists on non-interstate roadways.

## **2.7 Build New Pedestrian Facilities (Greenways and Bikeways)**

Several greenway and bikeway projects as well as sidewalk improvements are underway in Davidson, Rutherford, Sumner, Williamson and Wilson counties. These are on-going projects that will continue for several years. Following is a county level list with a brief description and completion status.

### **Davidson County**

Richland Creek Greenway – this is a multi-use paved trail which was completed in the summer of 2007.

Whites Creek Greenway – this is a multi-use paved trail which was completed in the summer of 2007.

Hillsboro Pike Sidewalk Improvement – this is a regional activity center and sidewalk improvement project. The design work has been completed. Funding for construction has not been provided.

East Bank River Path – this is a multi-use paved trail that has been completed.

The Nashville-Davidson County Strategic Plan for Sidewalks and Bikeways was completed in 2003. During the past four years, a total of 70 miles of new bikeway facilities have been completed at a cost of \$450,000 in local capital funds.

There were 3.5 miles of new sidewalks built from January to May, 2007, and 7.7 miles of sidewalks is under construction or has been recently completed. Since 1999, a total of 104 miles of new pedestrian facilities have been completed with 81 miles constructed by Davidson County and 23 miles by new developments in Davidson County. There are 33 miles of new pedestrian facilities currently underway in Davidson County. Since 1999, Davidson County has approved \$78,750,000 for pedestrian and sidewalk facilities. Of that amount, \$55,160,000 has been spent with the \$23,590,000 balance planned for additional pedestrian facilities.

### **Sumner County**

The Hendersonville Bike and Pedestrian Trail, Phase 2, is a multi-use paved trail that was designed in two portions. The South portion has been completed. The design work for the North portion has been completed. At this time, there is no scheduled completion date for the North portion.

The design work has been completed and bids will be let in the near future on the SR-52 Sidewalk Project which includes the following sections.

- Searcy Lane from College Street alongside the new Portland High School to Highway 52 West;
- From the intersection of Highway 52 West and Searcy Lane to the existing sidewalk system on New Highway 52; and,
- From the existing sidewalk east of the intersection of Highway 109 and Highway 52 East along the south side of New Highway 52 East connecting the sidewalk system proposed for the signal installation project at the intersection of Highway 52 East and South Russell Road.

#### Rutherford County

The Fergus Road Sidewalk project includes constructing sidewalks from Gale Lane to Bill Stewart Boulevard. Construction began late in the summer of 2006. However, this project was delayed. Construction is scheduled to resume in the Spring/Summer of 2008 with completion scheduled in the Fall/Winter or 2008.

The Stones River Road Sidewalk project includes constructing sidewalks on the east side of Stones River Road. This project is under construction with an estimated completion date of the Spring/Summer of 2008.

The City of Murfreesboro has multiple greenway segments under design. The Stones River Greenway Extension (SRGE) Phase I, Section I, with a length of 2,300 feet, was completed during the summer of 2006. The SRGE Phase II, with a length of 16,710 feet, was bid in the spring of 2007. The SRGE Phase III, with a length of 4,870 feet, was bid in the fall of 2007. The SRGE Phase IV, with an extension of 13,810 feet will be bid in the spring of 2008. The Gateway Trail Phase I, with a length of 9,800 feet, was bid in the summer of 2007, and Phase II, with a length of 4,280 feet, will be bid in the spring of 2008.

#### Williamson County

The Franklin Greenway project is underway and scheduled for completion in 2007. So far, a  $\frac{3}{4}$  mile section along Spencer Creek has been completed in order to connect to an existing trail system leading from Aspen Grove Park. The City of Franklin Parks Department is currently bidding a bridge to span Spencer Creek in order to join these two greenways. Installation of the bridge began in July, 2006. The project has an anticipated completion date of 2008.

The Harpeth River Walk had been set to begin construction on December 1, 2005. Due to unforeseen delays related to an archeological study, construction is now scheduled to begin in the Summer of 2008. When completed, the Harpeth River Walk will join an existing greenway system traveling south along the Harpeth River adding  $\frac{1}{2}$  mile to the overall length of the greenway.

In the last few years, The City of Brentwood has completed 3.75 miles of bikeway that connects three subdivisions and Ravenwood High School to their existing bike trail system.



### Wilson County

Cedar City Trail (Phase 1, 2, 3 and 4) – this is a multi use paved trail and park. Phases 1 and 2 have been completed. Phase 1 was the construction of a large park area that included a playground, restrooms and circumferential walking trail with riverwalk connection. Phase 2 connected the Phase I trail to an existing trail that leads to the existing recreation center. Design work has been completed on Phases 3 and 4. The project is waiting regulatory approval. The estimated completion date is Spring, 2008.

The City of Lebanon Downtown Sidewalk Project is under construction. The project has been implemented and is on-going. Long term funding has been committed to this project.

## **2.8 Improve Bus Ridership**

Several Park and Ride lots have been constructed in Davidson and Wilson County. These park and ride lots are part of the Music City Star Commuter Rail Line that will directly affect bus and rail ridership. These lots were completed in time for the September, 2006 start-up of the Music City Star Commuter Rail Line. The extension of bus service from Davidson County to Wilson County to include Lebanon and reverse service from Davidson County is currently in daily service.

The Metro Transit Authority (MTA) in Davidson County is expanding express bus service in order to increase the number of express routes to previously unserved/underserved areas of the county. This project is underway and will be an on-going effort to attract more riders.

During FY07 (7/1/06 – 6/30/07), MTA provided the local community with close to 8.5 million trips. This is about a six percent increase over the previous fiscal period, and almost 500,000 additional rides on MTA vehicles when compared to last year.

Ridership has increased steadily over the past 12 months and continues to grow. Average ridership has jumped from 27,000 trips per weekday to 30,000. Over the past several years, 100 new MTA buses have been purchased and received with the financial support of Nashville Mayor Bill Purcell and the Metro Council. The entire fleet is now fully accessible to people with disabilities. These new buses are more functional for passengers, and they have lower emissions than the older buses they replaced.

In addition, the MTA recently installed new credit card software and hardware within the MTA network so that customers have the option of using their credit or debit cards to pay their fares on the buses. The Nashville MTA is the only transit agency in the country accepting credit cards at the fare box on the buses for an entire system.

A partnership has developed between the MTA and Vanderbilt University to promote bus ridership to Vanderbilt employees. This has resulted in employee bus ridership of approximately 2,000 trips per month. Clean Air Partner Vanderbilt University was nominated for and won the 2006 Governor's Environmental Stewardship Award in the Pollution Prevention Category. Vanderbilt University is the first company in the Middle Tennessee area to obtain a Best Workplaces for Commuters Designation, thanks in large part to its

commitment to pay the MTA fares for employees commuting to and from Vanderbilt University and Vanderbilt Medical Center.

MTA has further expanded its employer-sponsored ridership program, also called "Easy Ride", to include Belmont University. From January to April of 2007 MTA provided over 8,000 commute rides for Belmont students and employees. Belmont is also working directly with RTA on a similar program with the newly opened commuter rail (Music City Star).

In addition, MTA participated with the State of Tennessee on a pilot program for State employees to use the "Easy Ride" program. Based on the results of the pilot project the state has agreed to continue the program into 2007 and 2008.

RTA has operated extended Express Bus Service to Lebanon since September, 2006. This route provides midday and "shadow" bus service in conjunction with the Music City Star Commuter Rail Line.

In conjunction with Phases 2 and 3 of the Traffic Signal Synchronization project in Davidson County, a Transit Priority Implementation program will be implemented. This project will install pre-emption and priority control technology along corridors for buses and include the evaluation of express service along Lebanon Pike. The Transit Priority Implementation program will be implemented along with the Traffic Signal Synchronization project. Phase 2 has been completed. At this time, there is no scheduled completion date.

MTA has recently taken delivery of 13 new Para Transit buses to replace aging vehicles and in the next few months will order between 6 and 8 articulated buses to increase their carrying capacity on several routes. The articulated buses are larger and improve energy consumption by allowing MTA to use fewer buses to carry the same amount of passengers.

In April 2007, MTA began a new on-demand shuttle service called BusLink serving the communities of Green Hills and Belle Meade in Davidson County. BusLink provides point-to-point service within a geographically defined "demand zone" throughout these communities. Customers may call the BusLink service and be picked up and dropped off at any of the 60 stops within the demand zone. It also connects to existing MTA routes bordering Green Hills and Belle Meade facilitating transfers to the fixed route bus system and increasing public transit convenience. Since BusLink is an on-demand service (similar to taxi service), passengers can choose to keep their private vehicles parked and instead utilize BusLink to run errands or for other activities that usually add SOV trips generating additional ozone precursors. Since beginning operation in April 2007, average ridership on BusLink has been 53 rides per week or roughly 530 rides through May of 2007.

The MTA Music City Central is a regional transportation hub (landport) which will include a new transit facility in downtown Nashville. This new facility will offer downtown transit operations, bus parking/loading areas, a climate controlled waiting area, restrooms, retail areas such as coffee shops and newsstands, bus schedule and ticket sales information. It is designed to replace the current open-air shelters located in downtown Nashville. Construction began during the summer of 2007. The expected completion date is the Fall of 2008.

The City of Murfreesboro (Rutherford County) began operation of a fixed route system in April 2007. The service is being provided five days a week from 6:00 a.m. to 6:00 p.m. The fleet consists of nine (9) vehicles, six (6) of which are in operation at any one time. The system operates in a pulse method with all six routes focusing on a downtown transfer location.

In April, 2007, the Franklin Transit Authority (Williamson County), operated and managed by The TMA Group for the City of Franklin, expanded the service provided by the Franklin Trolleys – Franklin's public transportation system. The Franklin Trolleys are four vintage-styled bio-diesel burning vehicles. The expanded service included all four routes running on Saturday (in addition to Monday – Friday), more trolleys stops, headways reduced by 30 minutes, and having a central transfer point at The Factory at Franklin.

The newest addition to Franklin's public transportation service is TODD (Transit on Demand), which provides pre-arranged curb-to-curb pick up and drop-off service, as well as all-day, same-day service. As with the Franklin Trolleys, all TODD vehicles are ADA accessible. TODD vehicles can accommodate 8-10 passengers.

On April 17, 2007, the Franklin Transit Authority and the City of Franklin opened the doors of the new Transit Center, located at 708 Columbia Avenue. The Transit Center is a brick two story 4,490 square-foot building in downtown Franklin. The structure was designed especially with the public and transit rider in mind, with specific attention to ADA compliance. The Center is complete with a ticket and information window, transit rider waiting area, public restrooms, vending machines and a trolley stop.

In 2006, the City of Franklin was awarded a \$200,000 grant from the Energy Division of TDEC to help buy a hybrid-electric engine for a vehicle used by the Franklin Transit Authority. The Franklin Transit Authority received the hybrid trolley in the Fall of 2007.

## **2.9 New Rail Service (Nashville-Lebanon corridor)**

The Music City Star Commuter Rail Line has been completed and is in daily operation. The park and ride lots have been completed. The Nashville-to-Lebanon commuter rail line began operation in September, 2006. The rail line begins in Lebanon with stops in Martha, Mt. Juliet, Hermitage and Donelson before arriving at Riverfront Park in downtown Nashville. There are two dedicated buses that distribute commuters throughout downtown and the West End Corridor.

During the 2006 holiday season the Music City Star provided special nighttime train service on Thursday and Friday nights. Service began on Thursday, November 16, and continued every Thursday and Friday night during November and December, 2006. The service began again for Friday evenings only on April 7, 2007 through the end of 2007.

In addition to its normal daily schedule, the Music City Star runs Sunday service to the Tennessee Titans football games. Two trains leave in the morning from Lebanon with all the usual stops along the way. Two trains return in the afternoon departing 45 minutes and 90 minutes after the conclusion of the game.

## **2.10 Land Use Planning that Reduces Driving**

Mixed use developments are in various stages of development and building in Davidson, Rutherford, Williamson and Wilson counties. It will take several years for these developments to be completely built out. Following is a status report on the projects that are currently underway.

### **Lennox Village in Davidson County**

Lennox Village is a Traditional Neighborhood Development with mixed-use retail and residential development. It encompasses approximately 207 acres. This project is currently under construction. Approximately 75% of the housing units have been completed, and approximately 25% of the retail units have been completed.

### **Bedford Avenue in Davidson County**

The Bedford Avenue project includes changed zoning to incorporate mixed-use development and an improved streetscape. This project is currently under construction with approximately 50% of the development completed. The scheduled completion date is December, 2008.

### **Carothers Crossing in Davidson and Rutherford Counties**

The Carothers Crossing project is a Traditional Neighborhood Development with mixed-use retail and residential development. It encompasses approximately 500-600 acres. Phases I and II are under construction with a scheduled project completion date of approximately 2010.

### **Lenox of Smyrna in Rutherford County**

This project is adjacent to Lennox Village in Davidson County. It is a 69 acre mixed use project with 312 residential units mixed between single family detached, single family attached and apartments. There is 18,000 square feet of commercial space planned. This project is just beginning with the infrastructure currently being developed. The completion date is approximately 2016.

### **Providence Place in Wilson County**

Providence Place is currently under construction. There have been 687 residential building permits issued. Use and occupancy permits have been issued for 549 homes. A large office, retail and restaurant center is currently under construction with several large department stores open and most of the smaller tenant spaces already occupied. Upon completion, there will be nearly 830,000 square feet of retail space built. When completely built, the development will contain approximately 3,200 homes in close proximity to office, retail and restaurants.

Del Webb Builders has purchased 354 acres of Providence and is building 1069 of the planned 3,200 homes. This is a "55 and over" community with many retirees buying into the development. With the adjacent office, retail and restaurant space, average trips per day and trip length should be reduced.

Indian Lake Village in Sumner County

This is a mixed use development on 300 acres. It consists of 1,000 high density residential units, 850,000 square feet of retail and 2,000,000 square feet of office space. A commuter rail station is planned on the adjacent CSX rail line. The project is currently under construction with a completion date of approximately 2016.

Durham in Sumner County

This is a traditional neighborhood development with 1,100 units in a variety of housing types planned. Housing will surround a village center. An extensive system of bike/pedestrian ways are planned that will be linked to similar facilities in the City of Hendersonville and Sumner County bike/pedestrian system. The completion date is approximately 2016.

Willowbrooke in Sumner County

This is a traditional neighborhood development with 650 residential units planned. An extensive system of bike/pedestrian ways are planned that will be linked to similar facilities in the City of Hendersonville and Sumner County bike/pedestrian system. The completion date is approximately 2016.

Westhaven in Williamson County

Westhaven is under construction with approximately 650 of the planned 2,750 homes built. This development will contain mixed use residential and retail.

**2.11 Air Quality Forecasting, Outreach and Action Day Program**

The Clean Air Partnership of Middle Tennessee directs the Air Quality Action Day program for the eight county area surrounding Davidson County. This program continues to develop, promoting the use of local air quality forecasts to induce voluntary behavior changes that improve air quality and protect the health of sensitive individuals. The goals of the program, the progress and the near term planned activities of this program follow.

The program has four main goals.

- Increase the public's understanding about ozone and PM<sub>2.5</sub> and how they are formed;
- Increase the public's awareness/use of locally available air quality forecasts;
- Identify and target the behavioral changes that will be most effective to reduce emissions contributions from individual and household choices; and,
- Educate corporations in Middle Tennessee about air quality issues and commuter choice benefits.

Increasing the public awareness of basic ozone and PM<sub>2.5</sub> issues is designed to:

- Broaden the base of support for local and regional emission reduction programs;
- Lay the groundwork for programs designed to create behavioral changes;
- Garner positive publicity for emission reduction programs; and,
- Lay the groundwork for wider publicity of the local air quality forecast.

Progress to date includes:



- Introductory meetings and continued relationships with weather staff at each of the local TV news stations;
- Development and continued support of the Clean Air Partnership of Middle Tennessee's website [www.cleanairpartnership.info](http://www.cleanairpartnership.info) and quarterly newsletter;
- Participation in the Nashville Earth Day Festival from 2003 through 2007 and several other public events including inviting Dr. Anthony DeLucia to speak about the health effects of ozone and fine particles at the St. Thomas Hospital Asthma Update Conference in 2006;
- Campus Sustainability Conference in 2006;
- World Asthma Day in 2006;
- Clean Air Day in 2006;
- Several clean air fairs in 2007; and,
- Interviews aired on local TV news and radio programs relating to Air Quality Action Days in 2005, 2006, and 2007.

In addition, CAP representatives have been quoted in several recent newspaper articles and television news stories related to air quality and transit. Radio PSA's, paid radio spots on three stations, paid television spots on the Fox17 and Country-Western stations, four television interviews on the Fox 17 Tennessee Mornings show, interstate and major arterial billboards are in place throughout the area. Also, a bus wrap promoting ridesharing, and four graffiti ads in area establishments are in use to help increase public awareness.

Planned activities include:

- Promoting air quality curriculum materials for use in area public and private schools;
- Partnering with area schools and businesses interested in developing air quality projects as part of the Tennessee Pollution Prevention Partnership program;
- Generating additional media coverage surrounding current air quality events; and,
- Making air quality presentations for area Planning Commissions.

By increasing the public's awareness and use of locally available air quality forecasts, the partnership hopes to provide at-risk populations with air quality forecast information before planning the day's activities, and ensure the general public knows which days are most important to practice emissions-reducing behaviors. This portion of the program is designed to help at-risk populations take appropriate steps to protect themselves on poor air quality days, reduce emergency room visits by at-risk populations, and more effectively deliver messages targeting behavioral change.

Progress to date includes:

- Nashville being one of only five cities in the U.S. to participate in the pilot of EnviroFlash email advisory service, providing automated customized web-based email air quality forecast information to subscribers beginning in October 2004;
- Nashville hosting a media event promoting the state-wide rollout of EnviroFlash in May, 2005;
- The completion of a pilot study evaluating the status and needs of local health care providers regarding the air quality forecasts and patient education and impacts;

- Providing air pollution and health effects information and local resources to local residents through health fairs; and,
- The inclusion of air pollution speakers and presentations at local medical update conferences.

Web traffic statistics show increased CAP website traffic on air alert days, confirming that people are reacting to air alerts and seeking additional information.

Ongoing activities include partnering with the American Lung Association of Tennessee and the Nashville Asthma Task Force coalition to provide air pollution and health information to asthma service providers and patients, and providing medical educational material and patient handouts directly to health care providers for sensitive populations in Middle Tennessee. The results of the health care provider study were presented at the EPA Air Quality Conference in February 2007. The CAP is also targeting at-risk populations with air quality information by participating in the ALA Asthma Walk in June 2007.

It is planned that by identifying and targeting behavioral changes, the CAP will help ensure that the public has a clear understanding of the desired behavioral changes, and success will be realized in changing the behavior of a significant percentage of citizens. The ultimate goals are improved health for citizens (due to improved air quality) and fewer exceedances of the ozone and PM<sub>2.5</sub> NAAQS (due to changed behavior on days forecast for poor air quality).

Progress to date includes:

- A baseline survey of over 1,400 Middle Tennessee households on air quality awareness and related behaviors;
- A follow-up survey of over 600 people;
- Finalization of \$649,000 in funding for an outreach program and advertising campaign;
- Radio advertising on two of the top five Nashville radio stations during the 2006 and 2007 ozone seasons; and,
- Billboard advertising aimed at commuters initiated in 2007.

CAP continues to partner with Vanderbilt University faculty and graduate students involved in health, behavior change theory, marketing, and the environment to maximize the survey and marketing impacts. In addition, CAP's public relations and marketing firm continues to develop partner resources, grassroots support, additional outreach opportunities, and earned media coverage.

Planned activities include conducting follow-up surveys of Middle Tennessee households and the development of the Clean Air Partnership of Middle Tennessee into a formal non-profit organization in order to facilitate continued funding and operations of the outreach program. Individuals and businesses are also being recruited as "Clean Air Partners". The list of individuals and businesses that have pledged to take active steps and spread the word about improving air quality continues to grow and is currently nearing 250 individuals and businesses.

The Clean Air Partnership of Williamson County (CAPWC), a public outreach initiative program in partnership with The TMA Group and Williamson County Government is the

oldest such initiative in the area. To date, 60 leading employers are Partners representing over 14,000 employees. Each year, the prestigious Outstanding Clean Air Partner award is given to those Partners who have gone “up and beyond” in their commitment in making a difference concerning air quality issues.

Clean Air Partnership of Williamson County staff conducts on-site informational sessions at Partners’ business location. CAPWC staff conducts on-site informational session at Partners’ business location. Partners are asked to distribute educational materials to their employees notifying them of Air Alert Days and to encourage the use of alternative modes of transportation as well as practicing simple daily practices that can help reduce pollution. CAPWC designs and writes all educational materials that are distributed to partners, including a monthly e-newsletter, *InMotion*.

CAPWC illustrates to area employers the adverse affects of ozone and PM (particulate matter) on regional economic development, public health and the environment, which could result in designation as a Non-Attainment Air Quality Area.

CAPWC coordinates the Air Alert Day notification program by issuing via email alerts to all Partners, local governmental entities and media.

Since 2004, CAPWC has produced a family oriented monthly cable half-hour educational television series, *Air Care*. This show is the only one of its kind in the region; it is now seen globally via the world-wide web at [http://www.tmagroup.org/clean\\_air.php](http://www.tmagroup.org/clean_air.php). CAPWC educates all citizens of the area about air pollution and its health hazards. Guests discuss environmental issues that affect everyone living in Williamson County and middle Tennessee. Transportation, Environmental and Healthcare professionals offer viewers suggestions on ways to help eliminate traffic congestion, reduce air pollution, and protect their health from pollution along with tips on how to save money on transportation costs and utility expenses.

CAPWC lead the way in advocating for free trolleys rides on the Franklin Trolleys – Franklin’s public transportation system on Air Alert Days. Daily air quality information, along with more information about the Clean Air Partnership of Williamson County can be found at [www.tmagroup.org](http://www.tmagroup.org).

### **3.0 Conclusion**

The Middle Tennessee EAC area continues to implement the measures specified in the March 31, 2004 Air Quality Improvement Plan (AQIP). Most have been completed as scheduled. Some of the voluntary emission reductions are still in progress with activities planned for several years to come. These voluntary measures were not relied on for the modeled attainment demonstration, but we are confident that they are providing air quality benefits now and into the future. The one federally enforceable measure (expansion of the existing IM program to include gas and diesel vehicles up to 10,500# GVWR) was implemented April 1, 2005 as scheduled.

Based on quality assured ozone ambient air quality data, for 2004 through 2007, all monitors in Middle Tennessee demonstrated attainment with the 8-hour ozone NAAQS. Therefore, the Middle Tennessee EAC area has demonstrated attainment with the 8-hour ozone NAAQS by



the prescribed date of December 31, 2007. In fact, the area has shown attainment with the 8-hour ozone NAAQS since 2004. We are confident that the Middle Tennessee Early Action Compact has been a success and will continue to show positive air quality benefits in the Middle Tennessee area for many years to come.

Based on the success of the Middle Tennessee Air Quality Improvement Program as evidenced by attainment of the 8-hour ozone NAAQS, the State and Local governments of Middle Tennessee respectfully request that EPA designate the area to attainment as soon as possible. We also understand that the 1-hour ozone NAAQS will be revoked one year from the effective 8-hour ozone attainment date.

## APPENDIX A

(615) 340-5653

Writer's Direct FAX Number:  
(615) 340-2142

November 13, 2007

Mr. Jackie Waynick  
Chief of Technical Services  
Tennessee Air Pollution Control  
Department of Environment and Conservation  
9<sup>th</sup> Floor – L & C Annex  
401 Church Street  
Nashville, Tennessee 37243-1531

Dear Mr. Waynick:

As required by the *Code of Federal Regulations Part 58, Appendix F, Section 1*, the Metro Public Health Department, Pollution Control Division, Nashville and Davidson County Tennessee is required to certify our data in order that the state senior air pollution control officer may certify that the contents of the SLAMS Annual Report to EPA are accurate. Enclosed is a disk containing the AMP240 Precision/Accuracy Summary Report, the AMP450 Quick Look Report, and the AMP250 Precision/Accuracy Raw Data Report which represents the Ozone data generated by this agency for the period of March 1, 2007 through October 31, 2007. The data have been passed through the validation process and are considered valid data as they appear in EPA's AQS database. The data have also been checked for completeness and accuracy and comply with the regulations as set forth in 40 CFR Part 58, Appendix F.

If you have any questions concerning this matter or require additional information, please call me at 340-5653.

Sincerely,

Mathew Grupke, Chemist  
Division of Pollution Control

MG/mg

cc: Mr. Billy Pugh

**DIVISION OF AIR POLLUTION CONTROL  
9TH FLOOR, L & C ANNEX  
401 CHURCH STREET  
NASHVILLE, TN 37243-1531**

December 5, 2007

CERTIFIED MAIL: 7007 0220 0000 1425 2802  
RETURN RECEIPT REQUESTED

Mr. David Lutz  
U.S. Environmental Protection Agency  
109 TW Alexander Drive  
MD C304-06  
RTP, NC 27711

Dear Mr. Lutz:

This letter is to advise you the State of Tennessee has completed entry of a portion of its ambient ozone data for the 2007 monitoring season into AQS. Ozone data for reporting organizations 1025, 0581, 0682, 0673, and 0170 have been evaluated according to EPA criteria and is complete and accurate to the best of this agency's knowledge. Copies of the AMP 255 Excel Summary Reports and AMP 450 Report are enclosed with this letter and have been forwarded to you electronically. Please proceed with placing the proper certification flag on this data in AQS.

We have flagged a number of days we believe ozone was affected by exceptional events in 2007. Our initial request to confirm the exceptional events was sent to Region 4's Doug Neeley on August 3, 2007. A final package is being prepared at this time for submittal.

If you have any questions regarding this matter or need additional information, please contact Mr. Billy Pugh at (615) 532-0528. Thank you for your assistance.

Sincerely,

Jackie L. Waynick, Manager  
Technical Services Program

JLW/jct

Enclosure

cc: Darren Palmer, EPA Region 4  
Danny France, EPA Region 4  
Lynne Liddington, Knoxville APC  
Bob Rogers, Memphis APC  
Robert H. Colby, Chattanooga APC  
Rob Raney, Nashville APC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

AUG 21 2007

Rob Rainey, P.E., Director  
Pollution Control Division  
Metro Public Health Department  
311 23<sup>rd</sup> Avenue, North  
Nashville, TN 37203

SUBJECT: Nashville Early Action Compact Area – December 2007 Attainment and  
Milestone Report

Dear Mr. Rainey:

The Environmental Protection Agency (EPA) Region 4 received the June 25, 2007, progress report for the Nashville Early Action Compact (EAC) Area. The progress report was received on-time and is consistent with the *Protocol for Early Action Compacts Designed to Achieve and Maintain the 8-Hour Ozone Standard*, and subsequent guidance.

We commend your EAC Area on implementation of the control measures to which the area committed in the December 2004 EAC State Implementation Plan (SIP) revision. EPA's data indicates that the 2004-2006 ozone design values for the Nashville EAC Area are below the 8-hour ozone standard. We appreciate the work accomplished by your office and the local organizations, and the Areas' continued efforts to meet the objectives of the EAC program. Finally, we encourage all contributing to the success of the EAC Area to maintain their commitments as we continue through the 2007 ozone season and we reach the December 31, 2007, attainment date.

In accordance with the EAC protocol the next required EAC milestone is that each area demonstrate attainment with the 8-hour ozone standard no later than December 31, 2007. In order to show attainment, it will be necessary for each state to submit 2 letters to EPA regarding this milestone. The first will be a letter to EPA certifying that the 2007 8-hour ozone ambient air monitoring data for each EAC area has been quality assured and entered into the Air Quality System (AQS) by December 31, 2007. This type of letter is routinely sent to the EPA by June of each year for the previous ozone season. However, in order for all EAC areas to meet the EAC protocol timelines, it is necessary for this letter to be expedited and submitted by December 31, 2007. The second letter will be an EAC milestone report explaining that the State has continued to implement all applicable control measures through December 2007 and that the State has certified that the 2005 through 2007 ozone season monitoring data for each EAC area has been quality assured and shows attainment with the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). The second letter is also due by December 31, 2007. Provided that the area successfully attains the 8-hour ozone NAAQS by December 31, 2007, EPA anticipates designation of the area as attainment by April 15, 2008.

As you may already be aware, if the area has a deferred effective date of its nonattainment status and the area violates the 8-hour ozone NAAQS before December 31, 2007, the area's nonattainment designation will become effective no later than April 15, 2008. The State will then be required to submit a revised attainment demonstration SIP revision no later than one year after the effective date of the nonattainment designation which, at the latest, would be April 15, 2009.

Thank you again for your efforts toward improved air quality in the EAC area. Should you have any questions, please contact me at 404-562-9026 or have your staff contact James Hou of the EPA Region 4 staff at 404-562-8965.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay T. Prince for".

Kay T. Prince  
Chief  
Air Planning Branch

cc: Barbara Driscoll, EPA OAQPS  
Barry Stephens, Director, TDEC